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NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP LEED ENVIRONMENTAL, INC.

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June 6, 2000

Telecopy and First Class Mail

Mr. Brad Bradley U.S. Environmental Protection Agency 77 West Jackson Boulevard Chicago, IL 60604-3590

> RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois Consent Decree Voluntary Progress Report 13 (May 2000)

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during May 2000.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During May 2000, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities. Tasks performed by ENTACT in May 2000 included remediation of two residential lots, paving of Slough Road, miscellaneous restoration work to the final grade at the industrial site, and miscellaneous other activities. After these activities had been completed, ENTACT demobilized its equipment and personnel from the site. Through May 2000, ENTACT has completed remedial activities at 769 residential lots and 32 remote fill lots.
- During May 2000, ARCADIS Geraghty & Miller ("ARCADIS") continued field activities associated with the pre-design investigation for groundwater.
- On May 1, 2000, a progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on May 2, 2000 to document the results of the meeting.



- On May 2, 2000, the Group's project coordinator issued a voluntary progress report to EPA.
- On May 8, 2000, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on May 22, 2000 to document the results of the meeting.
- On May 11, 2000, the Group's project coordinator provided an executed copy of an access agreement to Mr. Carl Cannon, National Steel Corporation, Granite City Steel Division, Granite City, Illinois, for installation and sampling of groundwater monitoring wells.
- On May 11, 2000, the Group's project coordinator provided a letter to EPA to confirm that ARCADIS and its well driller, Philip Environmental Services Corporation, would remobilize to the site on May 15, 2000 to install groundwater monitoring wells on the National Steel Corporation, Granite City Steel Division property as part of the predesign field investigation for groundwater.
- On May 18, 2000, the Group's project coordinator provided an executed copy of an access agreement to Mr. Larry Hurt, Terminal Railroad Association of St. Louis ("Terminal Railroad"), for installation and sampling of groundwater monitoring wells on the Terminal Railroad property.
- On May 22, 2000, the Group's project coordinator provided a letter to EPA to document the locations at which groundwater monitoring wells had been installed on the National Steel Corporation and Terminal Railroad properties. The letter also confirmed that, except for groundwater monitoring well GMMW-114 which could not be installed due to access restrictions, ARCADIS completed installation of groundwater monitoring wells on National Steel Corporation and Terminal Railroad Association of St. Louis properties on May 19, 2000.
- During the week of May 21, 2000, ARCADIS completed groundwater sampling activities for the newly installed monitoring wells on the National Steel Corporation and Terminal Railroad properties.
- On May 22, 2000, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ENTACT, and the Group's Technical Committee.

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- On May 24, 2000, ARCADIS issued a letter to the Granite City Wastewater Treatment Plant requesting authorization to discharge groundwater monitoring well development water to the City's sanitary sewer through a manhole located at 15th and State Streets.
- During a telephone conversation on May 30, 2000, EPA's project manager and the Group's project coordinator discussed EPA's request for possible installation of a monitoring well to evaluate groundwater quality in an off-site area from the northwestern portion of the site.
- During May 2000, ARCADIS and Group representatives completed efforts to secure access to off-site properties for installation and sampling of groundwater monitoring wells.

2. Summary of Data and/or Results of Sampling and Tests Received:

 Data from soil sampling activities performed by ENTACT during May 2000 in residential lots have previously been provided by ENTACT personnel to EPA and have been used as the basis for defining soil excavation depths.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

- Not applicable for this reporting period.
- 4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:
 - ENTACT will complete overseeding of the Taracorp pile (completed on June 2, 2000) and street sweeping activities.
 - ENTACT will continue efforts to prepare final reports to summarize the remedial activities which were performed at the site.
 - ARCADIS personnel will continue to perform predesign investigation activities for groundwater. Laboratory data from groundwater sampling during May 2000 will be received, provided to EPA, and validated. The Group's Technical Committee anticipates that a meeting will be held with EPA to discuss the data. EPA will be advised of the Group's continuing efforts.

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ARCADIS personnel will continue efforts to revise the Predesign Investigation Work
Plan for Groundwater to address EPA's comments. Finalization of the Predesign
Investigation Work Plan had been delayed pending resolution of access issues
associated with the proposed monitoring well installations and confirmation of final
locations for the new wells.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

As documented in previous reports to EPA, the Group and ARCADIS encountered difficulties in securing access to properties for installation of monitoring wells. With the finalization of access agreements to National Steel Corporation and Terminal Railroad on May 11, 2000 and May 18, 2000, respectively, ARCADIS and the Group completed efforts to secure access to properties for installation and sampling of groundwater monitoring wells addressed in the Predesign Investigation Work Plan for Groundwater. A complete listing of the Group's efforts to secure access is summarized in Table 1.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

 As requested by EPA, ENTACT provided photographs to EPA that were utilized in conjunction with EPA's media event at the site on May 10, 2000.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

Jeffrey A. Leed Project Coordinator

attachment

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cc: Ms. Sandra Bron - Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Jack Kratzmeyer - ARCADIS Geraghty & Miller (w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1 NL INDUSTRIES/TARACORP SUPERFUND SITE STATUS OF ACCESS TO PROPERTIES FOR PREDESIGN INVESTIGATION FOR CROUNDWATER

Monitoring	Well Status						
Well ID	Proposed	Existing	Area	Tax ID#	Site Address	Tax Payer Address	Access Status
MW 101			Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		1	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Monitoring well sampled without access agreement.
MW 103		Y	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		~	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		~	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		7	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		V	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

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Monitoring	Well	Status		Tax ID#	Site Address	Tax Payer Address	Access Status
Well ID	Proposed	Existing	Area				
MW 105S		1	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D			Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		~	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		V	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		V	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		(not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Monitoring	Well	Status		Tax ID#		Tax Payer Address	Access Status
Well ID	Proposed		Area		Site Address		
MW 108 S	•	(not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		(not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 109-92		(not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 110		(not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		(not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	V		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	V		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Monitoring	Well Status		us .				
Well ID	Proposed	Existing	Area	Tax ID#	Site Address	Tax Payer Address	Access Status
MW 112			Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113			Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-113	7						Access agreement issued to the City of Granite City in January 2000. Approval (right-of-way permit) has been obtained from Granite City for well installation
GMMW-114	7		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	An executed access agreement was issued to National Steel Corporation on 5/11/00.
GMMW-115	7		Main industrial	21-1-19-24-18-301-002	National Steel Corp.	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	An executed access agreement was issued to National Steel Corporation on 5/11/00.
GMMW-116	7		Main industrial		Terminal Railroad Assoc. of St. Louis 700 North Second Street St. Louis, MO 63102		An executed access agreement was issued to Terminal Railroad Association of St. Louis on 5/18/00.
GMMW-117	•		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99. Access agreement signed by Brian Kearns, Bissell Street Warehouse Co., on 12/31/99.

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Monitoring	Well	Status					
Well ID	Proposed	Existing	Area	Tax ID#	Site Address	Tax Payer Address	Access Status
GMMW-118	7		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.
GMMW-118			Venice Township		Right-of-way on south side of Kerr Street (approx. 200 feet east of intersection of Kerr Street and Main Street)	City of Venice, City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand- delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, the City of Venice authorized well installation at a city council meeting.
GMMW-119			Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.
GMMW-119			Venice Township		Right-of-way on the east side of 4th Street (approximately 100 feet south of intersection of 4th Street and Granville Street)	City of Venice City Council c/o Mayor Tyrone Echols Venice City Hall Broadway & Kline Venice, IL 62090	Access agreement hand- delivered to Mayor Tyrone Echols, City of Venice, and city attorney on 1/25/00. On 2/29/00, City of Venice authorized well installa- tion at city council mtg.
GMMW-120	•		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement received from Sarah B. Page-Collins 1/31/00. Also, a right-of-way permit authorization for monitoring well installation has been received from Madison County Highway Department.
GMMW-121	*		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verlillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verlillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.

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Monitoring	Well Status						
Well ID	Proposed	Existing	Area	Tax ID#	Site Address	Tax Payer Address	Access Status
GMMW-121 (continued)					Northern parkway of Mary Street, south of Watson Street		A right-of-way permit authorization for moni- toring well installation has been received from the Madison County Highway Department.
GMMW-122			Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99. A signed access agreement was received on 1/28/00.
					Northwest side of Earle Street, south of Allen Street		A right-of-way permit authorization for moni- toring well installation has been received from the Madison County Highway Department.
GMMW-123	•		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99. Access agreement signed by Mark Bayley, Martin and Baily, Inc., on 12/24/99.
					Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		Access agreement hand-delivered on 1/11/00. City of Madison City Council has approved the request for access to the public right-of-way. A written agreement/ permit is not required, but the building inspector must be contacted prior to drilling.
GMMW-124 GMMW-125	√		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	An executed access agreement was issued to National Steel Corporation on 5/11/00.